

**Law Office of Qais Zafari (SBN: 231767)**

**Qais Zafari, Esq.**

424 East Sixth Street suite 3

Corona CA 92879.

Tel: 951.898.0266

Fax: 866.895.5921

Attorney for Claimant  
JAMILA SOZAHDAH

**US BANKRUPTCY COURT**

**CENTRAL DISTRICT – LOS ANGELES DIVISION**

In re:	)	<b>Case No. 2:21-bk-13473-ER</b>
ANTHONY HUNG QUAN HO,	)	
	)	Chapter 7
Debtor,	)	
	)	
	)	Date: November 2, 2021
	)	Time: 10:00 a.m.
	)	Place: Courtroom 1568
	)	Roybal Federal
	)	Building 255 E.
	)	Temple Street Los
	)	Angeles, California
	)	
	)	

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**OBJECTION TO CHAPTER 7 TRUSTEE'S MOTION FOR: (1) AUTHORIZING  
SALE OF ESTATE'S RIGHT, TITLE, AND INTEREST IN REAL PROPERTY  
FREE AND CLEAR OF LIEN OF JAMILA BIBI SOZAHDAH; (2) APPROVING  
OVERBID PROCEDURE; AND (3) WAIVING RULE 6004(H) STAY**

JAMILA BIBI SOZAHDAH objects to chapter 7 Trustee Timothy Yoo's  
motion to sell the 50% interest in property located at 6 Meyer Court, Hermosa  
Beach, California 90254.

1 I am the Claimant in this matter. I have personal knowledge of all the facts  
2 stated in this objection except those stated upon information and belief, which facts  
3 I believe to be true. I am competent to testify and would testify to all facts stated  
4 in this declaration if called upon to testify as a witness.  
5

6  
7 BACKGROUND INFORMATION  
8

- 9 1. Petitioner Dr. Anthony Ho and I were married on November 12, 2012,  
10 and separated on May 27, 2018, after he filed for a Petition for  
11 Dissolution of Marriage on July 3, 2018.
- 12 2. A Notice of Pendency of Action was recorded on 3-30-2021, due to the  
13 filing of the Dissolution of marriage and my community interest in the  
14 property. **Please see attached pendency of action as Exhibit-1 (copy**  
15 **of recorded pendency of action).**
- 16 3. Dr. Ho used joint marital funds as a down payment on the property  
17 located on 6 Meyer Court, Hermosa Beach, CA 90254. **Please see**  
18 **attached as exhibit-2 (copy of check used and bank statement**  
19 **showing withdrawal).**
- 20 4. I contend I have a community property interest in the property purchased  
21 with community funds.
- 22 5. A proof of claim has been filed on 10-18-2021, asserting my claim on  
23 the property.
- 24 6. Debtor owes me 50% of whatever interest he is entitled to as part of any sale  
25 of the property.  
26  
27  
28


CONCLUSION

This sale should not proceed until it is determined what my interest in the property is and the priority of my claim to any proceeds of any sale of the property.

I declare under penalty of perjury under the laws of the State of California that all of the foregoing is true and correct.

Executed this 18th day of October, 2021, in Corona, California.

Dated: Oct. 18, 2021

  
/s/ Jamila Sozahdah  
Jamila Sozahdah  
Claimant

**Law Office of Qais Zafari (SBN: 231767)**  
**424 East Sixth Street suite 3**  
Corona CA 92879  
Tel: 951.898.0266  
Fax: 866.895.5921

**Attorney for Claimant**  
**JAMILA SOZAHDAH**

**US BANKRUPTCY COURT**

**CENTRAL DISTRICT – LOS ANGELES DIVISION**

In re:	)	<b>Case No. 2:21-bk-13473-ER</b>
ANTHONY HUNG QUAN HO,	)	
	)	
Debtor,	)	Chapter 7
	)	
_____	)	Declaration of Jamila Sozahdah in
Jamila Sozahdah,	)	Opposition to Sale of Residence.
	)	
Claimant.	)	
	)	
_____	)	

I, JAMILA SOZAHDAH, declare as follows:

I am the Claimant in this matter. I have personal knowledge of all the facts stated in this declaration except those stated upon information and belief, which facts I believe to be true. I am competent to testify and would testify to all facts stated in this declaration if called upon to testify as a witness.

**BACKGROUND INFORMATION**

1. Petitioner Dr. Anthony Ho and I were married on November 12, 2012, and separated on May 27, 2018, after he filed for a Petition for Dissolution of Marriage on July 3, 2018.

1           2. I filed my Response on July 26, 2018, at which time I did not have  
2  
3 legal representation, until January of 2019. The dissolution is still on-going.

4           3. It is stated that on September 18, 2018, I transferred my entire interest  
5  
6 in the property located on 6 Meyer Court, Hermosa Beach, CA 90254.

7 However, my signature was fraudulently induced on the basis that I did not  
8 know the implications of what I was coerced into signing.

9           4. I was told by Dr. Ho that if I did not sign the document, he would do  
10  
11 everything in his power as a Medical Director to ensure I lose access to our  
12  
13 business which ran on his medical license. Out of fear for losing my means of  
14  
15 income and livelihood, I signed a document at a time I did not have any legal  
16  
17 counsel, because I did not have the financial means for representation.  
18  
19 Furthermore, after separation, Dr. Ho removed me from all joint bank accounts  
20  
21 without my knowledge or consent and violated automatic temporary  
22  
23 restraining orders which included him selling a joint property in which I had  
24  
25 shared interest in on or around 2020 located in Benicia, CA.

26           5. Dr. Ho used joint marital funds as a down payment on the property  
27  
28 located on 6 Meyer Court, Hermosa Beach, CA 90254. Dr. Ho has depleted all  
of our marital assets since our separation which also included bankrupting our  
joint company DripDoctors Inc. which I co-founded and built into a multi-

1 million dollar company prior to his hostile takeover and unlawfully terminating  
2 me from my position.  
3

4 6. In April of 2020, I had to hire Artea Counsel to seek an order for a  
5 motion to compel further responses and to request production of documents  
6 pertaining to the DripDoctors' entities. As an owner, Dr. Ho denied me through  
7 legal counsel my access to community assets, thus depriving me of financial  
8 information, and prolonging and running up the expense of litigation to force me  
9 into a position of surrender. Dr. Ho has used his position of power and our joint  
10 marital funds to financially bankrupt me, and attempt to eliminate my access to  
11 remaining martial assets, which are still unresolved in the family court  
12  
13  
14

15  
16 7. I contend I have a community interest in the property bought with  
17 community funds.  
18

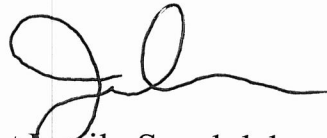
19 8. Dr. Ho also removed community funds from our joint bank accounts  
20 of which I owed half.  
21

22 9. Debtor owes me half of the proceeds of the residence, as well as half the  
23 community bank accounts he liquidated.  
24  
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28

1 I declare under penalty of perjury under the laws of the State of California that all  
2  
3 of the foregoing is true and correct.

4 Executed this 18th day of October, 2021, in Corona, California.

5  
6  
7 Dated: Oct.18, 2021

8   
9 /s/ Jamila Sozahdah  
Jamila Sozahdah  
Claimant

Branch :NAG,User :JVAN

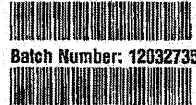
Comment:

Station Id :UY0M

## EXHIBIT-1

1 **LAW OFFICE OF QAIS ZAFARI**  
2 **QAIS ZAFARI, ESQ. (SBN: 231767)**  
3 424 E. Sixth St., Ste. 3  
4 Corona, Ca 92879  
5 Tel: (951) 898-0266  
6 Fax: (866) 895-5921

20224125



Batch Number: 12032735

7 **ATTORNEY FOR RESPONDENT**  
8 **JAMILA BIBI SOZAHDAH**

9 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
10 **FOR THE COUNTY OF LOS ANGELES**  
11 **CENTRAL DISTRICT**

12 **ANTHONY HO,**

Case No.: 18STFL08124

13 Petitioner,

14 v.

**NOTICE OF PENDENCY OF ACTION**  
**[CCP SECTION 405.20 & SECTION**  
**405.22].**

15 **JAMILA BIBI SOZAHDAH,**

16 Respondent.

17  
18  
19 **TO PETITIONER, ANTHONY HO AND HIS ATTORNEY OF RECORD, IF ANY:**  
20 **COMES NOW,** Jamila Bibi Sozahdah, Respondent in the Petition for Dissolution of  
21 **Marriage** currently pending in the Superior Court of California, County of Los Angeles, does  
22 hereby assert a real property claim and hereby gives notice of a pendency of an action in which  
23 that real property claim is alleged pursuant *California Civil Code §405.3*. The real property  
24 affected by this action is located at 6 MEYER CT, HERMOSA BEACH, California, more  
25 particularly described as follows:  
26  
27

28 1- NOTICE OF PENDENCY OF ACTION [CCP SECTION 405.20 & SECTION 405.22]



Branch :NAG,User :JVAN

Comment:

Station Id :UY0M

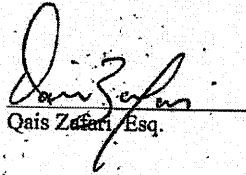
1 Real property in the city of Hermosa Beach, County of Los Angeles, State of California described  
2 as follows:

3 A PARCEL OF LAND LOCATED IN THE STATE OF CA, COUNTY OF LOS  
4 ANGELES, WITH A SITUS ADDRESS 6 MEYER CT, HERMOSA BEACH, CA  
5 90254-5450 C007 CURRENTLY OWNED BY HO ANTHONY & HO JOSEPHINE L  
6 HAVING A TAX ASSESSOR NUMBER OF 4186-029-035 AND BEING THE SAME  
7 PROPERTY MORE FULLY DESCRIBED AS P.M 390-96-97 LOT 1 CONDO UNIT  
8 2 (AIRSPACE AND 1/2 INT IN COMMON AREA) DATED 0 AND RECORDED 0.  
9

10  
11 From the time of recording this Notice, a purchaser, encumbrancer, or other transferee of  
12 the real property described in the Notice shall be deemed to have constructive notice of the  
13 pendency of the noticed action as it relates to the real property.

14 I, Qais Zafari, attorney for the Respondent, Jamila Sozahdah, declare under penalty of  
15 perjury under the laws of the State of California, that I have read the Notice of Pendency of Action,  
16 and I know it is true of my own knowledge, except as to those things stated upon information and  
17 belief, and as to those I believe it to be true.

18  
19 Dated: March 30, 2021

20   
Qais Zafari, Esq.

21  
22  
23  
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26  
27  
28 2- NOTICE OF PENDENCY OF ACTION [CCP SECTION 405.20 & SECTION 405.22]

Branch :NAG,User :JVAN

Comment:

Station Id :UY0M

1 State of California

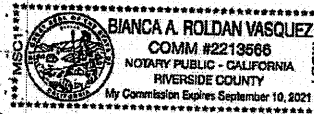
2 County of Riverside

3 On 3/30/21 before me, Bianca A. Roldan Vasquez, Notary Public

4 Personally appeared QAIS ZAFARI, who proved to me on the basis of satisfactory evidence to  
5 be the person whose name is subscribed to the within instrument and acknowledged to me that he  
6 executed the same in his authorized capacity, and that by his signature on the instrument the  
7 person executed the instrument.

8 I certify under PENALTY OF PERJURY under the laws of the State of California that  
9 the foregoing paragraph is true and correct.  
10

11 WITNESS my hand and official seal



12  
13  
14 [Signature of Bianca A. Roldan Vasquez]

15 Signature of Notary Public

(Seal)

16  
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27  
28 3- NOTICE OF PENDENCY OF ACTION [CCP SECTION 405.20 & SECTION 405.22]

Branch :NAG,User :JVAN

Comment:

Station Id :UY0M

**PROOF OF NOTICE DECLARATION**  
**(CCP § 8118)**

I, Qais Zafari, Attorney for the Respondent, Jamila Bibi Sozahdah, declare that I have served copies the NOTICE OF PENDENCY OF ACTION by Postage Paid Certified, Priority Mail Express with tracking service addressed to:

**ANTHONY HO**  
**6 MEYER CT., HERMOSA BEACH, CA 90254**

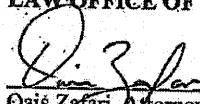
**ANTHONY HO, C/O**  
**LAW OFFICES OF DAVID S. KARTON**  
**9465 WILSHIRE BLVD., STE. 300**  
**BEVERLY HILLS, CA 90212**

**JOSEPHINE L. HO**  
**6 MEYER CT., HERMOSA BEACH, CA 90254**

On 3/30/2021 at 2:30 a.m. or (p.m.) from Corona, California, attached hereto and incorporated herein is the proof of mailing receipt and tracking record from the United States Postal Service and Proof of Service by Mail confirming that all the requirements of California Civil Code of Procedure §405.20, §405.22 & §8461 regarding this Notice of Pendency Action have been met and constructive notice of this action are thereby been given as provided by the laws of the State of California.

I declare under penalty of perjury that the forgoing is true and correct. Signed at Corona, California, on 3/30/2021.

**LAW OFFICE OF QAIS ZAFARI**

BY:   
Qais Zafari, Attorney for Respondent  
JAMILA BIBI SOZAHDAH

4- NOTICE OF PENDENCY OF ACTION [CCP SECTION 405.20 & SECTION 405.22]

**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF RIVERSIDE**

I am employed in the County of Riverside, State of California. I am over the age of 18 and not a party to the within action. My business address is 424 E. Sixth St., Ste. 3, Corona, California, 92879.

On 3/30/2021, I served the foregoing document described as

**NOTICE OF PENDENCY ACTION**

on all interested parties in this action by placing a true copy thereof in a sealed envelope addressed as follows:

**ANTHONY HO  
6 MEYER CT.  
HERMOSA BEACH, CA 90254**

**LAW OFFICES OF DAVID S. KARTON  
9465 WILSHIRE BLVD., STE. 300  
BEVERLY HILLS, CA 90212**

**JOSEPHINE L. HO  
6 MEYER CT  
HERMOSA BEACH, CA 90254**

**VIA U.S. MAIL** - I deposited such envelope Certified, Priority Mail Express in Corona, California, by personally delivering said mail to the United States Postal Service the envelope was mailed with postage thereon fully prepaid.

**VIA FACSIMILE** - I caused such document to be sent **VIA FACSIMILE** to the office of the addressee at the facsimile number listed above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 30<sup>th</sup> day of March 2021, in Corona, California.

  
\_\_\_\_\_  
QAIS ZAFARI, ESQ.

5- NOTICE OF PENDENCY OF ACTION [CCP SECTION 405.20 & SECTION 405.22]

## EXHIBIT-2

9/15/2018

ITEM 8  
Click Details • chase.com  
**CHASE** for BUSINESS  
Printed from Chase for Business

\$120,000.00  
Total



Aug 22, 2018  
Post date



1025  
Check #

RFP #51

<b>ANTHONY H. HO</b> 1100 S HOPE ST., APT. 1102 LOS ANGELES, CA 90015-2109		90-7162/2222	1025
DATE <u>Aug 17, 2008</u>			
PAY TO THE ORDER OF <u>Aaron Ho</u>		\$120,000-	
<u>One hundred twenty thousand</u>		DOLLARS	
<b>CHASE</b> JPMorgan Chase Bank, N.A. www.chase.com			
MEMO <u>Niger Ct.</u>		<u>[Signature]</u>	
⑆322271827⑆		2986 12000⑆ 1025	

8

JPMorgan Chase Bank, N.A. Member FDIC

©2008 JPMorgan Chase & Co.

Equal Opportunity Lender

CHASE PRIVATE CLIENT

August 01, 2018 through August 31, 2018  
Account Number: [REDACTED]

### CHECKS PAID

CHECK NUMBER	DATE PAID	AMOUNT
1000 *	08/06	\$4,200.00
1025 *	08/22	120,000.00
Total Checks Paid		\$124,200.00

If you see a check description in the Transaction Detail section, it means your check has already been converted for electronic payment. Because of this, we're not able to return the check to you or show you an image on Chase.com.  
\* All of your recent checks may not be on this statement, either because they haven't cleared yet or they were listed on one of your previous statements.  
\* An image of this check may be available for you to view on Chase.com.

### TRANSACTION DETAIL

DATE	DESCRIPTION	AMOUNT	BALANCE
	Beginning Balance		\$19,473.17
08/01	Quickpay With Zelle Payment To Luma Rent 7360316188		
08/02	Online Transfer From Sav ... 1135 Transaction#: 7369011858	-3,000.00	16,473.17
08/02	Remote Online Deposit	67,000.00	73,473.17
08/02	08/02 Domestic Wire Transfer Via: Citim Bk Cow 122213471 A/C Conciergo Escrow Southbay Inc Trust: Account Name: Concierge Escrow Southbay Inc Trust Account Reference: 82 M Fletcher, Escrow Officer: [REDACTED] Re: 003570-KI Inad: 08030100000004417 Tlx: 01507002142s	1,000.00	74,473.17
08/02	08/02 Domestic Wire Transfer Via: Citim Bk Cow 122213471 A/C Conciergo Escrow Southbay Inc Trust: Account Name: Concierge Escrow Southbay Inc Trust Account Reference: 82 M Fletcher, Escrow Officer: [REDACTED] Re: 003570-KI Inad: 08030100000004417 Tlx: 01507002142s	68,870.00	17,503.17
08/08	Quickpay With Zelle Payment To Luma Rent 7376401837	-1,791.00	15,712.17
08/08	Check # 1000	-4,200.00	11,512.17
08/07	Deposited from Returned Stop Payment 096008290 # of Items: 00001 Ck# 0000337616 Am# 0000100000 Dep Date: 08/0316 Ck Am# 0000100000	-1,000.00	10,512.17
08/08	08/07 Payment To Chase Card Ending IN 2685	-65.94	10,446.23
08/08	08/08 Online Transfer To Chk ... 1102 Transaction#: 7369088702	-360.00	10,086.23
08/16	Mbls.Com Auto Pay 6000840586 Web ID: 1850860002	-1,550.51	8,535.72
08/17	Deposit 1784201150	89,570.00	88,085.72
08/17	Online Transfer From Chk ... 9172 Transaction#: 7321103239	4,000.00	102,085.72
08/20	Online Transfer From Chk ... 9172 Transaction#: 7414083481	25,000.00	127,085.72
08/22	Check # 1025	-120,000.00	7,085.72
08/27	Quickpay With Zelle Payment To Josh Hushington Jans173199816	-700.00	6,385.72
08/31	Interest Payment	0.18	6,385.90
	Ending Balance		\$6,385.90

RFP #7  
RFP #41

RFP #42

RFP #45  
RFP #47  
RFP #49  
RFP #51

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
424 E. Sixth Street, #3 Corona, CA 92879

A true and correct copy of the foregoing document entitled (*specify*): OBJECTION TO CHAPTER 7 TRUSTEE'S MOTION FOR:  
(1) AUTHORIZING SALE OF ESTATE'S RIGHT, TITLE, AND INTEREST IN REAL PROPERTY FREE AND CLEAR OF LIEN  
OF JAMILA BIBI SOZAHDAH; (2) APPROVING OVERBID PROCEDURE; AND (3) WAIVING RULE 6004(H) STAY .

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 10-18-21, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Ryan Forrest on behalf of Creditor U.S. BANK NATIONAL ASSOCIATION ryan.forrest@bonialpc.com

Carmela Pagay on behalf of Trustee Timothy Yoo (TR) ctp@lnbyb.com

Daren M Schlechter on behalf of Interested Party Interested Party daren@schlechterlaw.com, assistant@schlechterlaw.com

James R Selth on behalf of Debtor Anthony Hung Quan Ho jim@wsrlaw.net, jselth@yahoo.com;dairi@wsrlaw.net;vinnet@ecf.inforuptcy.com

United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov

Timothy Yoo (TR) tjytrustee@lnbyb.com, tjy@trustesolutions.net

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) 10-18-21, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10-18-21 VINCENT LOPEZ  
*Date Printed Name*

/S/ VINCENT LOPEZ  
*Signature*

SERVICE LIST:

Purchaser

Josephine Ho

c/o Daren Schlecter

Law Office of Daren M. Schlecter, APC

1925 Century Park East, Suite 1180

Los Angeles, CA 90067

Lienholder

Jamila Bibi Sozahdah

8491 W. Sunset Blvd., #427

West Hollywood, CA 90069

Counsel for Sozahdah

Qais Zafari

424 E. Sixth Street, #3

Corona, CA 92879

Courtesy Copy

Hon. Ernest M. Robles

United States Bankruptcy Court

255 E. Temple Street, Suite 1560

Los Angeles, CA 90012